

EDMONDSON vs. TYSON, et al.
VALERIE J. HARWOOD

4:05-CV-00329
1/29/08

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiffs,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

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THE VIDEOTAPED DEPOSITION OF
VALERIE J. HARWOOD, Ph.D., produced as a witness
on behalf of the Defendants in the above styled and
numbered cause, taken on the 29th day of January,
2008, in the City of Tulsa, County of Tulsa, State
of Oklahoma, before me, Bonnie Glidewell, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

EDMONDSON vs. TYSON, et al.
VALERIE J. HARWOOD

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A P P E A R A N C E S

FOR THE PLAINTIFFS: Mr. David Page
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-and-
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FOR SIMMONS FOODS: Mr. John Elrod
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FOR GEORGE'S: Mr. Woody Bassett, III
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EDMONDSON vs. TYSON, et al.
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4:05-CV-00329
1/29/08

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4 Jefferson City, MO 65109
(Via phone)

5 FOR CAL-MAINE: Mr. Robert Sanders
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14 ALSO APPEARING: Mr. Samuel Myoda
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1	A	Correct.
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2 Q Have you given a deposition or testified in
3 any capacity other than as an expert witness?

4	A	No.
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5 Q So this is your first time testifying in any 08:12AM
6 capacity?

7	A	Correct.
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8 Q Okay. Let's switch to your work on this case.
9 When were you retained to begin working on this
10 case? 08:13AM

11 **A** I believe that it was in the summer of 2006,
12 but it could have been 2005. I'm really bad at
13 dates.

14 Q That's fine. Dates confuse all of us. Let me
15 give you or refer you to what's been marked 08:13AM

16 Defendants' Exhibit 1, which is your CV. Again,
17 there, under "Consulting and Industry Positions, do
18 you see "2004 to current: Microbiology MTC/
19 Consultant to Motley Rice, LLC"? Does that refresh
20 your memory as to when you began working on the 08:13AM
21 matters associated with this case?

22	A	Not really.
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23 Q Okay. So just to clarify for the record, in
24 your memory when did you begin working on this case?

25	A	In my memory, it was summer, 2006. It may	08:14AM
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